

**Summary of May 3, 2001
Indiana Department of Environmental Management (IDEM) and
Clean Manufacturing Technology and Safe Materials Institute (CMTI)
Meeting with Metal Finishers and POTWs Participating in
Metal Finishing Strategic Goals Program**

The meeting was called to order at 11:05 a.m. by facilitator Kathy Watson. The facilitator welcomed meeting participants and summarized the main meeting agenda items. The current SGP mailing list was circulated so meeting participants could indicate their attendance and note any additions/corrections to contact, address, phone, fax or e-mail information as needed. Also noted that today's meeting has been approved for two wastewater continuing education credits.

OPENING REMARKS FROM IDEM

After introductions by those in attendance, Jim Mahern, IDEM's Assistant Commissioner for the Office of Pollution Prevention and Technical Assistance, provided brief opening remarks as follows:

- Noted he is sitting in for Deputy Commissioner Tim Method,
- IDEM has prepared written comments on EPA's proposed Metal Products and Machinery (MP & M) effluent guidelines, with specific comments on a couple of pollution prevention technologies,
- Generally support inclusion of pollution prevention alternatives in the rule,
- Recognize additional comments coming from CMTI,
- Comments will include what IDEM might be willing to do regarding POTW oversight – Office of Water Quality to work with POTW's permit holders on pollution prevention, (i.e., if doing certain pollution prevention things, get "bye" on numerical treatment values – recognition of pollution prevention efforts),
- Agency will submit comments by due date, which has been extended until July 2, 2001,
- Debbie will send copy of IDEM's comments on the MP & M rule to those on the SGP mailing list after formal submittal of agency's comments to EPA,
- Also noted IDEM's consideration of EPA's initiative for metal casting sector.

Ted Heemstra commented that administration of pollution prevention can be burdensome to the POTWs, but if administered by IDEM's OWQ, there should be more uniformity (in administration) in the state.

NATIONAL/REGIONAL UPDATES

Al Fenedick, EPA Region 5

Al Fenedick (representing Joan Tanaka and Matt Gluckman) provided a summary of key EPA activities as follows:

- Metal Products and Machinery effluent guidelines - reported that the public comment period on the proposed MP & M regulation has been extended until July 2, 2001.
- 3rd Annual SGP Summit has been rescheduled from June to September 2001 in Washington, DC – likely dates are Sept. 10 and 11; or Sept. 12 and 13 following the AESF Government Relations Conference (Sept. 10-11 in DC). One focus will be on development of environmental management systems – provide a train-the-trainer workshop using part of what Region 9 has developed.
- By end of May, EPA intern Krista Durlas will be contacting participants with EMS training needs survey.
Note: Krista participating in today's meeting by conference call.
- Facility report card data from year 2000 format now on SGP website – trend information will be available by end of May.
- "Living the Vision" EPA publication released documenting national SGP successes available on SGP website. Best Access Systems/Indianapolis highlighted in report.
- F006 rulemaking – effort to write conditional exemption for ion exchange canisters, will be a public comment period. Region 9 office looking into a site-specific variance (i.e., WRC variance) in Arizona (Arizona is a non-delegated RCRA program).
- TRI – lead (Pb) reporting thresholds lowered. Region 5 will forward fact sheets to Debbie for dissemination to SGP mailing list (attached), Region 1 developing outreach plan on the rulemaking for SGP – will be made available.

INDIVIDUAL WORKGROUP REPORTS

RCRA Issues Workgroup

Workgroup co-lead Gary Romesser distributed and walked through written workgroup report (attached).

1. Distributed three (3) additional handouts:
 - ❑ IDEM Nonrule Policy Document – F006 Recycled Wastes: Allowing LQGs 180 (or 270) Days Accumulation,
 - ❑ IDEM Nonrule Policy Document – Satellite Accumulation of Hazardous Waste by Generators,
 - ❑ ** IDEM Document – Important Information About Changes to Manifesting Requirements (please see attached for complete copy of this document).
2. Concern raised about labeling of satellite containers in satellite accumulation areas. Try to educate metal finishers about the specific requirements – idea for potential article in upcoming SGP newsletter.

POTW Issues Workgroup

Sue Claussen/Michigan City reported on behalf of the POTW workgroup as follows:

1. A subcommittee of the IWPCA Municipal Pretreatment Committee, as well as Nancy Norton/Imagineering will be working on preparing comments regarding the proposed MP & M rule. (Several SGP POTW participants are involved in this subcommittee.) Have received AMSA comment ideas/approach and will also be working through IWPCA as well. POTW workgroup will share their written comments with the full SGP stakeholder group when comments completed.
2. Reported on behalf of Ken Zmudzinski/South Bend POTW that South Bend's ordinance will open in fall 2001. They are currently reviewing the Addison, Illinois local ordinance as model for ideas on pollution prevention.
3. Due to scheduling conflicts, have not been able to meet with Cheri Storms to discuss incentives for the proposed 5-Star Environmental Recognition Program. Hope to have Cheri attend the next IWPCA pretreatment committee meeting.
4. Recruitment efforts for additional POTWs continues. Have discussed the SGP with Brownsburg and others at recent municipal conference.

Technical and Financial Assistance Workgroup

Shayla Barrett of CMTI provided the following updates:

1. In regard to comments on the proposed MP & M rule, CMTI is pulling together pollutant loadings and other data to include in their comments. Shayla made a plea for information regarding pollutant loadings diminished, costs involved, etc. (anonymously if requested by facility). The more information showing pollution prevention works, the better. New system techniques such as drag out reduction, can be provided as supporting data.
2. Once again offered CMTI's free, confidential services to any interested metal finisher or POTW.
3. EMS SGP initiative – recently met with counterparts in Kentucky to exchange ideas. CMTI will once again try to set up an organizational meeting of facilities interested in pursuing an EMS prior to the next full SGP stakeholder meeting in August.

Recruitment Workgroup

1. Jerry Phillip walked through and distributed written workgroup report (attached).
2. Noted IDEM Commissioner Lori Kaplan also mentioned SGP merits during her speech at recent industrial operators' conference.
3. Will once again focus on comprehensive "413/433" list maintained by CMTI for their quarterly SGP newsletter, etc.
4. Suggestion for recruitment meetings at strategic cities. Have visited Kokomo; have Muncie, Anderson, Goshen on the list to visit.
5. Also noted that AESF.org website provides link to scientific control website that hints on data collection information of true value to EPA in regard to MP & M.
6. Brendan Clemens reported similar information may also be found at NAMF.org website.

Emergency Preparedness Workgroup

1. Dr. Corson reported that CMTI met with H.H. Sumco representatives at the Sumco facility on March 16 (Sumco has stepped forward to serve as a model for developing a metal finisher emergency preparedness manual). Conducted a plant tour and gathered information regarding their RCRA contingency plan and emergency planning efforts.
2. Distributed "Comprehensive Emergency Response Plan" template document. Requested that comments on this document be sent to Dr. Corson by July 31, 2001.
3. Draft to also include OSHA regulations and for RCRA generators (HAZWOPER and SARA Title 3 requirements).
4. By next meeting, hope to have a revised draft which includes responses to comments received.
5. Noted this emergency preparedness plan is also required per ISO 14001.

Performance Ladder/5-Star Workgroup

Cheri Storms of IDEM/OPPTA distributed copy of current working draft of IDEM's Metal Finisher 5-Star Environmental Recognition Program application/eligibility.

1. Current company participants requested to complete the application to see if easy to use, understandable, etc.
2. 5-Star Program on track for kick-off – for applications and marketing efforts.
3. Still working on incentives list. Will include POTW benefits where possible.

ENVIRONMENTAL MANAGEMENT SYSTEM PRESENTATION BY CMTI AND DISCUSSION

Shayla Barrett of CMTI distributed copies of slides used in EMS overview presentation which included:

- ☐ EMS Requirements,
- ☐ Environmental Policy,
- ☐ Planning – Environmental Aspects; Legal and Other Requirements; Objectives and Targets; Environmental Management Program,
- ☐ Implementation and Operation – Structure and Responsibility; Training, Awareness and Competence; Communication; EMS Documentation; Document Control; Operational Control; Emergency Preparedness,
- ☐ Checking and Corrective Action – Monitoring and Measurement; Nonconformance and Corrective and Preventive Action; Records; EMS Audit,
- ☐ Management Review,
- ☐ ISO 14001 Environmental Aspects and Impacts.

OTHER ISSUES/ANNOUNCEMENTS/FUTURE AGENDA TOPICS

Possible future agenda topics were offered and feedback provided as follows:

1. Progress/attaining specific SGP goals (e.g., 25% reduction in energy use).
2. Specific pollution prevention issues and technology options.

NEXT STEPS

1. Debbie to turn in applicant forms for wastewater continuing education units to IDEM's Office of Water Quality.
2. Debbie/IDEM to prepare draft written meeting summary.
3. Workgroup leads to submit written updates to 2001-2002 Indiana SGP implementation plan to Debbie.
4. IDEM to update working draft of 2001-2002 implementation plan based on input from workgroup leads.
5. Workgroups should continue to meet over the coming weeks.

DATE/LOCATION OF NEXT MEETING

Scheduled for Thursday, August 23 from 11:00 a.m. – 1:00 p.m. at the Marion County Extension Office, 9245 North Meridian Street, Indianapolis. Meeting notice and tentative agenda will be sent out in advance of the meeting.

ADJOURNMENT

The facilitator adjourned the meeting at 1:10 p.m.

Attachments:

TRI – lead (Pb) reporting factsheets
 RCRA Workgroup Report 5/3/01
 Recruitment Workgroup Report 5/3/01

Complete copy of IDEM document – “Important Information about Changes to Manifesting Requirements”